

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE UNIVERSITY OF WASHINGTON,
et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY, *et al.*,

Defendants.

CASE NO. 2:18-cv-01396-BJR

STIPULATED MOTION TO
EXTEND TIME TO RESPOND
AND [PROPOSED] ORDER

**Noted on motion calendar:
February 27, 2020**

JOINT STIPULATION

Plaintiffs THE UNIVERSITY OF WASHINGTON, the CENTER FOR HUMAN RIGHTS AT THE UNIVERSITY OF WASHINGTON, and ANGELINA GODOY (collectively “the UWCHR”), filed the above-captioned lawsuit under the Freedom of Information Act (the “FOIA”) against Defendants DEPARTMENT OF HOMELAND SECURITY (“DHS”), IMMIGRATION AND CUSTOMS ENFORCEMENT (“ICE”), and CUSTOMS AND BORDER PROTECTION (“CBP”) (collectively “Defendants”)

seeking the disclosure of certain documents related to the federal government’s treatment

1 of undocumented immigrants in the state of Washington. In the last status report, the
2 parties requested a briefing schedule to resolve the remaining open FOIA request
3 between UWCHR and ICE. Dkt. No. 35, Joint Status Report, at 3. Pursuant to this
4 request, the Court issued a briefing schedule requiring UWCHR's motion to be filed by
5 February 14, 2020; ICE's response to be filed by March 2, 2020; and UWCHR's reply by
6 March 9, 2020. Dkt. No. 36, Order. UWCHR timely filed its motion to compel. Dkt.
7 No. 37.

10 Since the filing, the parties have conferred and believe a resolution of this issue
11 may be possible without the need for additional judicial intervention. However, to do so,
12 the parties need to continue discussions concerning the scope of ICE's potential response
13 and schedule, which requires the involvement of ICE's attorney who has knowledge of
14 the case and remaining issues. Unfortunately, ICE's assigned attorney will be
15 unavailable from March 1, 2020 until March 9, 2020. Although the parties are making a
16 good faith effort to come to an agreement on the open FOIA request prior to her
17 departure, the parties, through their counsel, jointly request that the Court extend ICE's
18 time to respond to UWCHR's motion to compel in order to provide sufficient time for
19 discussions to happen. The parties request that the Court extend ICE's response filing
20 deadline from March 2, 2020 until March 13, 2020; and UWCHR's time to reply from
21 March 9, 2020 until March 20, 2020. The parties also ask that the noting date be
22 extended to March 20, 2020. If a resolution is reached, UWCHR shall withdraw the
23 motion to compel.

1 Accordingly, the parties hereby STIPULATE AND AGREE, AND JOINTLY
2 REQUEST that the Court extend ICE's time to respond to the motion to compel to March
3 13, 2020, and extend UWCHR's time to reply to March 20, 2020.
4

5 **SO STIPULATED.**

6 Dated this 27th day of February, 2020.

7 Respectfully submitted,

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[PROPOSED] ORDER

The Parties having so stipulated and agreed, the Court hereby ORDERS that ICE' Response to Plaintiffs' Motion to Compel (Dkt. No. 37) is due no later than March 13, 2020; and Plaintiffs' Reply is due no later than March 20, 2020. The motion is noted for March 20, 2020.

DATED this _____ day of _____, 2020.

DISTRICT JUDGE BARBARA J. ROTHSTEIN
UNITED STATES DISTRICT COURT